

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LUCAS SERRANO

FILED

JUN

MAY 30 2008  
5-30-08  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT JUDGE  
MAGISTRATE JUDGE  
GERALDINE SOAT BROWN

CASE NUMBER:

08CR

434

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 29, 2008 in Cook county, in the Northern District of Illinois defendant(s) did

by intimidation, take from the person and presence of a bank teller, approximately \$850 belonging to, and in the care, custody, control, management, and possession of Charter One Bank, located at 150 South Wacker Drive, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation,

in violation of Title 18 United States Code, Section(s) 2113(a).

I further state that I am a(n) Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Dominick A. Cicels  
Signature of Complainant

Sworn to before me and subscribed in my presence,

May 30, 2008 at  
Date

Chicago, Illinois  
City and State

Geraldine Soat Brown, U.S. Magistrate Judge  
Name & Title of Judicial Officer

Geraldine Soat Brown  
Signature of Judicial Officer

State of Illinois        )  
                                  )  
County of Cook         )

**AFFIDAVIT**

I, DOMINICK A. CICCOLA, first being duly sworn, state the following under oath:

1. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI). I have been a Chicago Police Officer for the 16 years, and a Chicago Police Detective for the past 6 years. I have been assigned to the FBI's Violent Crimes Task Force for approximately two years, conducting investigations of bank robberies, kidnappings, extortion and other violent crimes. I am an "Investigative or Law Enforcement Officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18.

**Introduction**

2. The information contained in this affidavit is based on my personal knowledge, as well as information obtained from official documents and the personal knowledge of other law enforcement officials, surveillance, and interviews of witnesses.

3. This affidavit is being submitted for the limited purpose of setting forth probable cause to support a criminal complaint. I have not set forth each and every fact known to me concerning this investigation. Rather, I have set forth only those facts that I believe are sufficient to establish probable cause to believe that on or about May 29, 2008, LUCAS SERRANO robbed the Charter One Bank (the bank) located at 150 South Wacker Drive, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

**Summary of the Facts Establishing Probable Cause**

4. According to a bank teller (Teller A) employed at the bank, on or about May 29, 2008, at approximately 1:58 p.m., SERRANO entered the bank and approached Teller A. After Teller A greeted SERRANO, SERRANO leaned towards Teller A, unfolded a demand note and displayed the note to Teller A. The demand note stated, "Give me the money, 8 100s 1 50 don't fuck with me I have a gun!" Teller A then observed SERRANO open his jacket and display what appeared to be the butt of a gun. After reading the note, Teller A opened his/her top bank drawer and removed \$850 in United States currency which he/she handed to SERRANO. SERRANO then told Teller A to walk away from his/her teller counter as he exited the bank.

5. Both the bank and the 150 South Wacker Drive building in which the bank is located possess security cameras. The footage from these cameras at the time of the robbery shows a man enter the 150 South Wacker Drive building and walk towards the front entrance of the bank. This footage was shown to security personnel from the 150 South Wacker Drive building, who positively identified SERRANO as the person depicted in the footage. The security personnel recognized SERRANO as a former employee of Business A, which is also located within the 150 South Wacker Drive building. The same security footage was also shown to employees of Business A, who also positively identified SERRANO.

6. FBI agents and task force officers then compiled a photo array, which included a known photo of SERRANO and five other men, and showed the array to Teller A. Teller A positively identified the photo of SERRANO as a picture of the person who robbed the bank on May 29, 2008.

7. FBI agents and task force officers then proceeded to the last-known address of SERRANO, in Chicago, Illinois, where SERRANO was taken into custody. Following his arrest, and after being advised of his Miranda Rights and waiving them, SERRANO admitted to entering

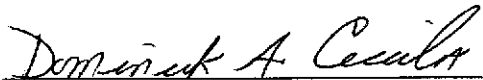
the bank, handing Teller A the note described above, and taking \$850 from the bank. Serrano further admitted that after leaving the bank he disposed of the note by tearing to pieces and disposed of the clothes he was wearing during the robbery by throwing them in a dumpster.

8. On May 29, 2008 the Charter One Bank was and is an institution whose deposits are insured by the Federal Deposit Insurance Cooperation (FDIC).


**Conclusion**

9. Based on the facts set forth above, there is probable cause to believe that LUCAS SERRANO did, by intimidation, take from the person and presence of bank employees, money, namely, approximately \$850 belonging to and in the care, custody, control, management, and possession of Charter One Bank, located at 150 South Wacker Drive, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

Further Affiant sayeth not.

  
DOMINICK A. CICCOLA  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to before me  
this 30th day of May, 2008

  
GERALDINE SOAT BROWN  
U.S. Magistrate Judge